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Attorneys for Plaintiff
CRISTINA MENDOZA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CRISTINA MENDOZA,

Plaintiff,

CASE NO. 5:17-cv-03579-SVK

v.

CITY OF SAN JOSE, PACIFIC GAS & ELECTRIC COMPANY, a California registered domestic stock corporation, HUDSON SKYPORT PLAZA, LLC, a Delaware limited liability company, HUDSON SKYPORT PLAZA LAND, LLC, a Delaware limited liability company, HUDSON PACIFIC PROPERTIES, INC., a Maryland corporation, SPIEKER PROPERTIES LP, a California limited partnership, EOP OPERATING LIMITED PARTNERSHIP, LP, a Delaware limited partnership, CA – SKYPORT I LIMITED PARTNERSHIP, a Delaware limited partnership, and DOES 1-100, Inclusive,

Defendant.

JOINT STIPULATION TO EXTEND DEADLINES TO RESPOND AND REPLY TO PLAINTIFF'S MOTION TO AMEND THE COMPLAINT [ECF 76] AND THE HEARING DATE [AND ~~PROPOSED~~ ORDER]

Plaintiff, CRISTINA MENDOZA (Plaintiff) and Defendants, HUDSON SKYPORT PLAZA, LLC, a Delaware limited liability company, HUDSON SKYPORT PLAZA LAND, LLC, a Delaware limited liability company, HUDSON PACIFIC PROPERTIES, INC., a Maryland corporation (HUDSON Defendants), hereby jointly stipulate and request through their attorneys of record the following:

WHEREAS, the parties have met and conferred regarding: (1) extending the time for HUDSON Defendant's Response and Plaintiff's Reply to Plaintiff's Motion to Amend the Complaint [ECF 76] and (2) extending the hearing date, the parties have reached the following agreement and hereby STIPULATE as follows.

1. Plaintiff and defendants have been working to reach a version of a First Amended Complaint to which the parties can stipulate. Plaintiff has sent the HUDSON Defendants counsel three drafts of the proposed First Amended Complaint. The Parties desire to continue to meet and confer regarding the form and content of the First Amended Complaint. The Parties hereby stipulate and respectfully request that the deadline for HUDSON Defendant's Response, be extended from March 16, 2020, to March 23, 2020, and the deadline for Plaintiff's Reply be extended from March 23, 2020, to March 30, 2020.

2. As result of the deadline to Respond and Reply being extended, and the fact that additional defendants may need to respond to a First Amended Complaint, the parties stipulate to and hereby respectfully request that the Court also extend the hearing date from April 7, 2020, to April 14, 2020.

IT IS SO STIPULATED.

Dated: March 16, 2020

ROPERS, MAJESKI, KOHN & BENTLEY

By: /s/ David M. McLaughlin

DAVID M. McLAUGHLIN
SPIROS E FOUSEKIS
DANIEL E. GAITAN
Attorneys for Defendants
HUDSON SKYPORT PLAZA, LLC, a
Delaware limited liability company,
HUDSON SKYPORT PLAZA LAND,
LLC, a Delaware limited liability company,
HUDSON PACIFIC PROPERTIES, INC.,
a Maryland corporation

Dated: March 16, 2020

DERBY, McGUINNESS & GOLDSMITH,
LLP

By: /s/ Anthony Goldsmith

ANTHONY GOLDSMITH
Attorneys for Plaintiff
CRISTINA MENDOZA

Dated: March 16, 2020

LAW OFFICE OF ROBERT B. KOPELSON

By: _____

ROBERT B. KOPELSON
Attorney for Plaintiff
CRISTINA MENDOZA

1 stipulate to and hereby respectfully request that the Court also extend the hearing date
2 from April 7, 2020, to April 14, 2020.

3 **IT IS SO STIPULATED.**

4 Dated: March 16, 2020

ROPER, MAJESKI, KOHN & BENTLEY

6 By: _____

7 DAVID M. McLAUGHLIN
8 SPIROS E FOUSEKIS
9 DANIEL E. GAITAN
10 Attorneys for Defendants
11 HUDSON SKYPORT PLAZA, LLC, a
12 Delaware limited liability company,
13 HUDSON SKYPORT PLAZA LAND,
14 LLC, a Delaware limited liability company,
15 HUDSON PACIFIC PROPERTIES, INC.,
16 a Maryland corporation

17 Dated: March 16, 2020

DERBY, McGUINNESS & GOLDSMITH,
LLP

18 By: _____

19 ANTHONY GOLDSMITH
20 Attorneys for Plaintiff
21 CRISTINA MENDOZA

22 Dated: March 16, 2020

LAW OFFICE OF ROBERT B. KOPELSON

23 By: _____

24 
25 ROBERT B. KOPELSON
26 Attorney for Plaintiff
27 CRISTINA MENDOZA
28

~~[PROPOSED]~~ ORDER

For GOOD CAUSE shown and for the reasons set forth above, the below deadlines are amended as follows:

Last day for Hudson Defendant's Response to ECF 76: March 23, 2020; Last day for Plaintiff's Reply to ECF 76: March 30, 2020; ~~and Hearing date extended to: April 14, 2020.~~ **The Court will determine if a hearing is needed once briefing has concluded.**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: March 16, 2020


Hon. Susan van Keulen
UNITED STATES MAGISTRATE JUDGE

FILER'S ATTESTATION

Pursuant to Civil Local Rule 5-1, I hereby attest that I, David M. McLaughlin, an attorney with Ropers, Majeski, Kohn & Bentley, received the concurrences of counsel in the filing of this document.

Dated: March 16, 2020

ROPER, MAJESKI, KOHN & BENTLEY

By: /s/ David M. McLaughlin

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